

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION

GREGORY LASKY,

Plaintiff,

vs.

BLUFFTON HOTEL, LLC,

Defendant.

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Civil Action No. 9:18-cv-474-RMG

**DEFENDANT'S ANSWER TO
PLAINTIFF'S COMPLAINT
(Jury Trial Demanded)**

Defendant, Bluffton Hotel, LLC, answers the Complaint and respectfully asserts the following:

FOR A FIRST DEFENSE

1. In response to Paragraph 1, the Defendant admits that the Plaintiff has alleged a violation of the Americans with Disabilities Act, 42 U.S.C, Section 12101, et seq., and that the Plaintiff alleges that the cause of action arose in Beaufort County, South Carolina. The Defendant however has removed the matter to the United States District Court, Beaufort Division based upon the federal question and asserts that venue is proper in this court.

2. In response to Paragraph 2, the Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegation and therefore denies same.

3. In response to Paragraph 3, the Defendant admits that it owns and operates a hotel known as the Comfort Suites located at 23 Towne Drive, Bluffton, South Carolina.

4. In response to the section of the Complaint titled Statement of the Case, the Defendant asserts that no response is required; however, should it be interpreted or implied that said paragraphs set forth allegations against this Defendant, said allegations are denied.

5. In response to Paragraphs 4 through 15, the Defendant lacks sufficient knowledge or information to form a belief as to the truth of said allegations and therefore, denies same; however, the Defendant asserts that, upon information and belief, it has not violated the Americans with Disabilities Act, and thus it is not liable to the Plaintiff nor is the Plaintiff entitled to the relief he seeks.

FOR A SECOND DEFENSE

6. The Defendant reserves any and all additional defenses including but not limited to the lack of personal jurisdiction over the Defendant once the method of service has been verified.

FOR A THIRD DEFENSE

7. Each and every allegation of the Complaint not specifically admitted is denied.

WHEREFORE, having fully answered, Defendant prays that the Complaint be dismissed, for the costs of defending this action, and for such other relief as the Court and jury deem just and proper.

MCANGUS GOUDELOCK & COURIE, L.L.C.

s/O. Carlisle Edwards, Jr.

O. Carlisle Edwards, Jr.

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ATTORNEYS FOR DEFENDANT, BLUFFTON
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February 19, 2018